

WORK ASSIGNMENT NO. 2-03
Technical/Regulatory Support for Subpart W of NESHAPS
WAM: Rosnick

PURPOSE AND SCOPE

Under this Work Assignment (WA), SC&A will provide technical and regulatory support to the EPA Office of Radiation and Indoor Air to develop a potential rulemaking to update the NESHAP Subpart W standard for radon emissions from operating uranium mill tailings impoundments which was promulgated on December 15, 1989 (40 CFR 61.250). Subpart W includes two separate standards. First, existing sources must ensure emissions from tailings impoundments do not exceed 20 pCi/m²-sec of radon-222. Second, new sources must comply with the requirements for constructing one of two types of impoundment structures. Subpart W requires that existing sources file an annual report of the facilities' emissions. These sites include the mills regulated by the NRC and its Agreement States.

Section 112(q) of the Clean Air Act, as amended, further requires EPA to review, and if appropriate, revise or update the Subpart W standard on a timely basis (10-year interval). To date, EPA has not revisited this standard since its promulgation and now desires to do so. The purpose of this WA is to provide follow-on contractor support for the development of a draft Background Information Document (BID) to support EPA's rulemaking efforts to determine if modification of Subpart W is warranted.

TECHNICAL STATUS

Progress Made During Period:

SC&A was provided a new WA (effective March 27th) under the new contract year to continue and develop a final version of the BID for the ongoing review of NESHAP Subpart W. All work effort during the period of November 2011 involved the completion of our effort to totally revise the draft BID sections (first 5 sections) of the document submitted under prior year WA 1-03. Based on continuing EPA comments and instructions, SC&A totally revised and modified Sections 1-5, which were submitted to the WAM as a final draft on October 27, 2011 for review. SC&A received a few additional comments which were resolved as of November 4th. SC&A awaits the resolution of final comments on Section 6 being done under Work Assignment 2-04, Task 2A prior to issuing the combined report BID/EIA in final. SC&A has provided frequent communication with the WAM and has prepared and submitted monthly reports and statements.

Difficulties Encountered and Remedial Action Taken:

None

Anticipated Activity Next Period:

As indicated, SC&A has completed its final revision of the first 5 sections which was submitted on October 27, 2011, and further resolutions on November 4, 2011. The remaining section (Section 6) of the combined BID/EIA document is handled under a separate WA (2-04). SC&A has been requested to add a small business impact review to section 6 by the WAMs of both

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WAs 2-03 and 2-04. SC&A expects to complete Sections 1-6 inclusive of the BID/EIA prior to December 30, 2011. Any effort expended during December on this WA will involve any final changes directed in Section 6 of the combined BID/EIA.

Schedule of Deliverables Next Period:

SC&A will submit its formal final of the BID/EIA by December 30, 2011.

OUTSTANDING ACTIONS AWAITING CONTRACTING OFFICER AUTHORIZATION

None

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OVERALL FINANCIAL INFORMATION				
	<u>Current</u>		<u>Cumulative</u>	
	<u>Hours</u>	<u>Amount</u>	<u>Hours</u>	<u>Amount</u>
Amount Claimed	20.0	2,765.00	337.0	\$42,792.78
Amount Shown on Work Plan			454.0	\$57,981.00
Amount Paid				\$36,155.59
Amount Suspended				\$0.00
Amount Disallowed				\$0.00
Remaining Amount			117.0	\$15,188.22
Unbilled Allowable Costs		\$0.00		\$0.00
Labor Estimates for Next Period			30.0	\$3,800.00
Estimate to Complete			117.0	\$15,188.22
Estimated Percentage of Completion, based on LOE				74%

LABOR SUMMARY									
		<u>Current</u>		<u>Cumulative</u>		<u>Negotiated (Work Plan)</u>		<u>Remaining</u>	
		<u>Hours</u>	<u>Costs</u>	<u>Hours</u>	<u>Costs</u>	<u>Hours</u>	<u>Costs</u>	<u>Hours</u>	<u>Costs</u>
P4	SC&A	17.00	2,372.19	305.00	39,060.28	442.00	55,638.00	137.00	16,577.72
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P3	SC&A	3.00	320.14	12.00	1,239.32	12.00	1,218.00	0.00	(21.32)
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P2	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	SC&A	0.00	0.00	20.00	1,161.76	0.00	0.00	0.00	(1,161.76)
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Technician	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clerical	SC&A	1.50	71.94	22.75	1,246.46	16.00	1,012.00	(6.75)	(234.46)
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total		20.00	2,764.27	337.00	42,707.82	454.00	57,868.00	137.00	15,160.18
Average Hourly Rate (Labor)					\$126.73	\$127.46			

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ODC DETAIL INFORMATION		
Item	Current	Cumulative
Publications/Subscriptions	\$0.00	\$0.00
Computer Supplies/Usage	\$0.00	\$0.00
Meetings/Travel	\$0.00	\$0.00
Supplies/Materials	\$0.00	\$0.00
Reproduction/Graphics	\$0.64	\$21.43
Telephone/Fax	\$0.00	\$29.11
Typing/Clerical	\$0.00	\$0.00
Postage/Delivery	\$0.00	\$24.25
Other	\$0.00	\$0.00
TOTAL	\$0.64	\$74.79
Sub ODCs	-	-
Burden on ODCs (including Sub ODCs)	0.09	\$10.17

WORK HOUR DETAIL THIS PERIOD		
	Name	Hours
P-4 Labor	A. Zeitoun	1
	H. Pettengill	16
P-3 Labor	L. Loomis	3
P-2 Labor	None	-
P-1 Labor	None	-
Technician Labor	None	-
Clerical Labor	Clerical	2